

BEFORE THE POSTAL RATE COMMISSION  
WASHINGTON, DC 20268

In the matter of:

Holman Post Office, New Mexico, 87723

Docket Number 1367246-87723901  
PRC Docket A-2012-18

Jack A Rains, Petitioner

REPLY COMMENTS OF JACK A RAINS

Docket No: A-2012-18  
Holman, NM Post Office 87723

Dear Sirs,

The Post Office response, as corrected on December 27, 2011, is just another repeat copied from the same generic form. The first version, submitted on December 23, 2011, even had gross mistakes such as our 8 mile proximity to Albany, NY. My Form 61 submitted in November (a copy is appended below) raises a number of issues confirming that no realistic evaluation of the community impact was made, or even attempted, as required under Postal Regulations. These points are not even addressed in the December 27, 2011 document.

Now that winter has arrived, there is further evidence concerning the snow problem cited at my item # 7 regarding Final Determination, item #58. We had a modest snow, only four inches. The highway contractor was unable to deliver to the classic flag on the side boxes. In this case, the owner is responsible to clear access. The question of who has responsibility to clear access to CBU's has still not answered. The road department is NOT going to do it and does NOT have the manpower, equipment or budget to do it, even if they wanted to. Does this mean no mail when it snows?

There is further new information regarding my item #6. At least one of the many home based businesses that relies entirely on the post office for shipping to customers, has announced that if the post office closes, she will too. The author of the postal response cannot seem to understand that no store-fronts does NOT mean NO businesses. Storefronts usually get their goods via truck, not the post office, and storefronts ship in either a plastic or brown paper bag hand carried to a private vehicle, not by post office. Our twenty some odd home based businesses use and rely on the post office for both directions. They do not individually move enough goods to justify a truck delivery or pickup.

Under questioning at the second public meeting, postal officials admitted that there is no comprehensive plan for selecting which post offices to close or save. What we are

seeing in New Mexico is a seemingly hysterical “close anything that offers a pretext” selection rather than a measured and metered approach. The PRC Advisory Opinion on the RAOI of the USPS dated December 23, 2011 (**PRC Advisory Opinion Finds USPS Proposal for Retail Closures Lacks Proper Analysis,** ) confirms this.

We understand that a handful of rural Post Offices are a large percentage of the total opposition to the retail closures. **It should be obvious that these communities are the ones in which the community impact is the greatest.** Simply leaving open a handful of the most vehement (out of the hundreds slated for closure) might be cost effective as well as a PR win. I believe that a realistic community impact appraisal would not support a closure decision and respectfully request the Post Office determination to close Holman Post Office be denied.

Thank you for your attention,

Jack A. Rains

NOVEMBER FORM 61 STATEMENT OF JACK A RAINS

Docket No: A-2012-18  
Holman, NM Post Office 87723

Dear Sirs,

I appeal the decision to close the Holman, NM Post Office on the grounds that the study of effect on the community as required by 39 U.S.C. 404(d)(2)(A)(i) was not actually considered. I believe that the decision to close was made, and then the Post Office simply did a pro-forma evaluation using frequently erroneous Internet sources and canned responses to client concerns. I will cite some examples.

1. The demographic data came from a web page, *Sperlings BestPlaces*, a copy of which is included in the Administrative Record, page 27. This lists the population as 3,438. If someone had been actually studying community effects, they might have wondered how a level 11 Post Office with 152 rented boxes satisfied the needs of over three thousand people.
2. Some data was taken from Google Maps, Administrative Record, page 6. The location of the Post Office is about a quarter mile from where indicated.
3. Three pictures of Holman are used in the Administrative Record, pages 10, 11 & 12, seemingly to tick the box that some requirement was filled. They are not typical of the area, do not show any relationship to the actual Post Office such as access and are not cited in the report.

4. The Post Office suggested that people can leave a note for the contract carrier to honk to complete a transaction. Only twenty-three residences are within earshot of the highway. On warm days, with windows open, you might be able to add another half dozen. Again, no realistic appraisal of the real situation was made.
5. This is an "Enterprise Zone" in a federally designated "Distressed Area". Nowhere in the documents is the impact on the existing small businesses in a poverty area addressed.
6. A list of small businesses was provided in the Final Determination together with a note that many questionnaires listed "no businesses". There was no attempt to reconcile this discrepancy. The fact is, that there are no "store-front" businesses, but a number of home-based businesses, several of whom are totally dependent on the Postal service.
7. In the Final determination, item #58 concerning snow removal, we were assured that the highway department snowplow would give access. In reality this gives access to the location, but piles of snow along the shoulder make it difficult to get out of the traffic lane to climb to the box. This is not a metropolitan area like Washington with dump trucks hauling away the snow.
8. Peripheral services such as a bulletin board could have been dismissed with a "Sorry, but that is not a Post Office obligation". Brusque but honest. Suggesting use of the fire department, which is an unmanned, normally locked volunteer station four miles away or the Head Start school with entry controlled for security reasons is just another proof that the Post Office did not try to do a genuine community impact study.
9. The data sheet used in the Administrative Record, pages 8, still lists the previous Postmaster (and her home phone for emergencies) over a year after her death. This is an indication that the closure file was already being prepared before the evaluation was complete.

In conclusion, it seems clear that no realistic study of the effect on the community was even attempted, beyond someone looking us up on the internet, and a public meeting telling us that service to a CBU was an improvement over an attended post office. There are many other issues, such as the high percentage of seniors; such as ignoring alternative solutions; such as lack of a detailed fiscal analysis. These have been detailed in the initial appeals and need to be addressed when the Post Office does an actual community effect study.

Jack A Rains

